### NORTH CAROLINA DIVISION OF **AIR QUALITY**

## **Application Review**

Issue Date: Draft - March 22, 2019

Region: Mooresville Regional Office

County: Catawba

**NC Facility ID:** 1800043 Inspector's Name: Bob Caudle

**Date of Last Inspection:** 11/01/2018

**Compliance Code:** 3 / Compliance - inspection

#### **Facility Data**

Applicant (Facility's Name): Century Furniture – Plant No. 3

Legal Name: Century Furniture, LLC

**Facility Address:** 

Century Furniture - Plant No. 3 3086 Main Avenue NW

Hickory, NC 28601

SIC: 2512 / Upholstered Household Furniture

NAICS: 337121 / Upholstered Household Furniture Manufacturing

Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V

**Permit Applicability (this application only)** 

SIP: 15A NCAC 02Q .0513

NSPS: N/A

**NESHAP:** 02D .1111 (Subpart DDDDD)

PSD: N/A

**PSD Avoidance:** N/A NC Toxics: N/A 112(r): N/A

Other:

RENEWAL ONLY - NO MODIFICATIONS

#### **Contact Data**

Facility Contact  Dennis Tart Environmental Engineer (828) 326-8376 PO Box 608 Hickory, NC 28603  Authorized Contact  Matthew Clark Plant Manager (828) 326-8376 PO Box 608 Hickory, NC 28603  Application Number: 1800043.18A  Dennis Tart Environmental Engineer (828) 326-8376 PO Box 608 Hickory, NC 28603  Application Number: 1800043.18A  Date Received: 08/24/2018 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03749/T18 Existing Permit Issue Date: 08/19/20 Existing Permit Expiration Date: 07/	14

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	СО	PM10	Total HAP	Largest HAP
2017		0.5500	37.72	0.4600	0.6200	2.41	1.54 [Toluene]
2016		0.5600	43.66	0.4700	0.6900	2.54	1.68 [Toluene]
2015		0.7000	48.68	0.5900	0.7600	3.26	2.14 [Toluene]
2014	0.0100	0.8100	48.57	0.6800	0.7800	3.44	2.30 [Toluene]
2013		0.6600	37.56	0.5500	0.5900	2.36	1.57 [Toluene]

Review Engineer: Judy Lee **Comments / Recommendations:** 

**Issue:** 03749/T19 **Permit Issue Date: Review Engineer's Signature:** Date: **Permit Expiration Date:** 

### I. Purpose of Application

This permitting action is for the following:

Renewal of an existing Title V permit pursuant to 02Q .0513. Century Furniture – Plant No. 3 (Century) currently holds existing Title V permit (03749T18) issued on August 19, 2014, and expires on July 31, 2019. The renewal application was received on August 24, 2018 in the Mooresville Regional Office (MRO). The Division of Air Quality (the Division or DAQ) Raleigh Central Office (RCO) received the application on August 29, 2018, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit will remain in effect until the renewed permit has been issued or denied.

### II. Facility Description

This facility manufactures and finishes upholstered furniture per the latest inspection report dated November 1, 2018 conducted by Mr. Robert Caudle, MRO.

Per Form A – General Facility Information submitted with the renewal application:

"The facility manufactures/assembles wood furniture items and applies stains, lacquers, and other finishing materials per customer requests. Natural gas boilers are used to provide space heat/comfort heat for the facility."

### > Facility name/address/legal name/responsible official check:

**IBEAM** compared with Renewal application submittal:

**Site Name per application is** Century Furniture – Plant 3; however, IBEAM has Century Furniture – Plant No. 3. Plant No. 3 is correct.

✓ NC Department of the Secretary of State Corporation search: https://www.sosnc.gov/ compared with IBEAM:

Legal Corporate/Owner Name is Century Furniture, LLC

- ✓ **IBEAM** lists Matthew Clark, Plant Manager as the Responsible Official (RO); however, the Renewal application submittal lists Keith Nichols, Plant Manager. The last inspection report has RO changed to Mr. Clark, but no RO request on record.
- ✓ **Responsible Official:** Updated per RO request submitted to MRO on September 25, 2018 for a change from Mr. Nichols to Mr. Clark with the proper Certification Statement (Refer to Section IV).

### III. Compliance History/Statement

During the most recent compliance inspection performed on November 1, 2018, Mr. Caudle, MRO, indicated that the facility appears to be in compliance with the applicable air quality regulations and Air Quality Permit No. 03749T18.

In accordance with the provisions of 15A NCAC 2Q .0520 and .0515(b)(4) the Responsible Official, Mr. Keith Nichols, Plant Manager, has signed the required Title V Compliance Certification - Form E5 dated August 21, 2018.

### IV. History/Background/Application Chronology

Please see the attached Comprehensive Application Report for 1800043.18A and email correspondence for more details.

XXXX, 2019 – DRAFT permit sent to 30-day public notice and 45-day EPA review. Public notice period ended XXXX, 2019. No comments were received. EPA review period ended XXXX, 2019.

March 12, 2019 – Comments received from Permittee on DRAFT permit.

March 7, 2019 – DRAFT renewal permit and review sent to Ms. Jennifer Womick, Mooresville Regional Office (MRO) for review and comment.

March 7, 2019 – DRAFT renewal permit and review sent to Mr. Samir Parekh, Stationary Source Compliance Branch (SSCB) for review and comment.

March 7, 2019 – DRAFT renewal permit sent to Permittee for comment prior to public notice and EPA review.

March 6, 2019 – Comments received on DRAFT renewal permit and review from Supervisor.

February 21, 2019 – DRAFT renewal permit and review sent to Supervisor for comments.

February 18, 2019 – Email response from Mr. Voelker, RCO regarding Boiler MACT language for the boilers at Century.

February 14, 2019 – Email response from MRO regarding RO change request.

February 13, 2019 – Email from RCO to Ms. Womick, MRO inquiring about RO change request.

February 12, 2019 – Email from RCO to Century Furniture regarding renewal application assignment, changes and boiler information.

February 5, 2019 – Email to Mr. Joe Voelker, RCO requesting Boiler MACT language for the boilers at Century.

August 24, 2018 – Renewal application received in the MRO.

### V. Permit Modifications/Changes and Title V Equipment Editor (TVEE) Discussion

### **Proposed Equipment Changes**

Equipment to be ADDED: none Equipment to be MODIFIED: none Equipment to be REMOVED: none

The following table describes the changes made to the current permit as part of this renewal:

Page No.	Section	Description of Changes
Cover Letter	N/A	<ul> <li>Updated cover letter with application number, permit numbers, dates, fee class and new letterhead</li> <li>Updated authorized contact information for the facility</li> <li>Added PSD class and increment statement</li> </ul>
Attachment	Insignificant activity list	No change needed
Attachment	Table of Changes	Revised for changes made to permit for this renewal
Permit Cover	N/A	Inserted new issuance and complete application date, application number, facility information
Page 3	Section 1	Added MACT DDDDD and updated Case by Case reference
Permit – Globally	Section 2 and Section 3	<ul> <li>Updated regulation references from "2D" and "2Q" to "02D" and "02Q" to be consistent with regulation nomenclature</li> <li>Updated with shell revisions</li> </ul>
Pages 4 – 6	Section 2.1 A	Modified Wood dust collection system control scenario to match equipment list
Pages 10 – 14	Section 2.1 C	Added MACT Subpart DDDDD
Pages 15 – 18	Section 2.2 A	Updated MACT Subpart JJ condition with latest shell revisions
Page 18	Section 2.2 B	Updated with latest shell revisions
Pages 19 – 28	Section 3	• Updated General Conditions (Version 3.6 01/31/12 replaced with Version 5.3, 08/21/2018)

Modifications to TVEE were required as a result of this renewal.

The permit contradicts itself in regards to the wood dust collection system control configuration. An email was sent to Mr. Tart, Century, on March 11, 2019 for clarification:

Wood dust collection system (ID Nos. WC-1) venting to one associated cyclone (ID No. CY2) in series with one bagfilter (ID No. B-2)

Email follow up from Mr. Tart on March 12, 2019 in regards to the control configuration:

"The Wood dust collection system (ID Nos. WC-1) vents into the bagfilter (ID No. B-2) and then to the one associated cyclone (ID No. CY2). From the cyclone the wood dust is collected in a dust collector and off loaded into a dust trailer periodically."

The permit was modified accordingly after a review of Century's documents and an email to Mr. Tart to confirm the correct system configuration. The system vents to the bagfilter, then to the associated transfer cyclone.

TVEE changes were reviewed and approved on March 22, 2019. See Permit Modification Tracking slip for confirmation.

### VI. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"

15A NCAC 02D .0512 "Particulates from Miscellaneous Wood Products Finishing Plants"

15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"

15A NCAC 02D .0521 "Control of Visible Emissions"

15A NCAC 02D .1109 "112(j) Case-by-Case Maximum Achievable Control Technology (CAA §

112(j) MACT) for Boilers and Process Heaters"

15A NCAC 02D .1111 "Maximum Achievable Control Technology"

[40 CFR Part 63 Subpart JJ]

15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"

An extensive review for each applicable regulation is not included in this document, as the facility's status with respect to these regulations has not changed as part of this renewal. However, 02D .1109 112(j) will be revised and the 112(d) standard for 40 CFR Part 63 Subpart DDDDD (boiler MACT) added during this renewal. For some regulations below more discussion is provided for clarification and background, where necessary. The permit will be updated to reflect the most current stipulations for all applicable regulations.

### 15A NCAC 02D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"

This regulation limits the allowable amount of particulate emissions from a boiler as a function of the facility-wide heat input capacity. Once a limit is determined, it will not be revised upwards or downwards if the facility-wide heat input capacity changes. The formula to determine the allowable emission rate is:

$$E = 1.090 \times 0^{-0.2594}$$

Where:

E = The allowable particulate emission rate, in pounds per million Btu heat input

Q = The facility-wide maximum heat input, in million Btu per hour

Based on the T18 permit, *E* for all boilers at the facility is 0.46 lb/mmBtu. The boilers only fire natural gas, which produces very little particulate in combustion. Therefore, no monitoring, recordkeeping, or reporting is required to show compliance with the regulation.

No changes to the permit stipulation are required.

### 15A NCAC 02D .0512 "Particulates from Miscellaneous Wood Products Finishing Plants"

This regulation requires that facilities provided adequate particulate control for wood finishing processes.

In order to demonstrate compliance, all of the particulate control devices (such as filters and cyclones) must be regularly inspected and maintained. Records of maintenance must be kept and reported twice per year.

Based on the most recent inspection, Century appears to be in compliance with the regulation. Based on the latest inspection report per IBEAM, Century has been submitting the required reports. Continued compliance will be determined during the next inspection.

No changes to the permit stipulations are required.

### 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"

This regulation limits SO<sub>2</sub> emissions from combustion sources to 2.3 pounds emitted per million Btu heat input.

The only combustion sources on the permit are the three natural gas-fired boilers. Natural gas has a very low sulfur content, so compliance with this regulation is assumed by default. There are no monitoring, recordkeeping, or reporting requirements.

No changes to the permit stipulation are required.

### 15A NCAC 02D .0521 "Control of Visible Emissions"

This regulation limits visible emissions (VE) from pre-1971 processes to less than 40% and post-1971 processes to less than 20% opacity when averaged over a six minute period. Sources are allowed one exception per hour. The hourly exception cannot exceed 87% opacity (90% for pre-1971 sources), and cannot occur more than four times per 24-hour period.

SB-1 through 16 are pre-1971 sources and all other sources at the facility are post-1971. In order to demonstrate compliance, Century must regularly inspect emission points for VE above normal. All monitoring must be recorded and reported twice per year.

Per the most recent inspection, there have been no VE violations or complaints against the facility. Based on IBEAM, Century has been submitting the required reports. Continued compliance will be determined during subsequent inspections.

No changes to the permit stipulations are required; however, during this renewal the conditions were revised with the most up to date condition which has new line items that were not in the previous condition. In addition, to be consistent with most permit stipulations the tables were revised to contain the opacity limits versus referring to the opacity condition in the permit.

### 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"

This regulation states that facilities must not emit odors that contribute to objectionable odors beyond the facility's property boundary.

There have been no odor complaints against the facility. During the most recent inspection, no objectionable odors that could have constituted a violation beyond the facility's property were observed. No monitoring, recordkeeping, or reporting is required for this regulation.

Continued compliance will be determined during subsequent inspections.

No changes to the permit stipulations are required.

# 15A NCAC 02D .1109 "112(j) Case-by-Case Maximum Achievable Control Technology" [CAA § 112(j) MACT for Boilers and Process Heaters]

On July 20, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General's office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT "hammer" provisions, have been triggered. North Carolina regulations

implementing the MACT hammer are found at 15A NCAC 02D .1109. NC DAQ developed this guidance to provide standards and compliance procedures that it has determined meet the requirements of § 112(j).

This facility has three natural gas-fired boilers (ID Nos. BNG-1, BNG-2 and BNG-3) subject to the Case-by-Case MACT 112(j) due to the U. S. EPA's failure to promulgate a valid standard; thus, Century Furniture's permit contains DAQ established requirements for these boilers under 112(j). The initial compliance date for 112(j) for Century Plant No. 3 was February 5, 2013.

Century must use best combustion control practices when operating the boilers. Furthermore, Century must perform annual tune-ups and boiler inspections on each boiler. Records of maintenance and tune-ups must be kept.

Century is required to comply with their existing 112(j) requirements until May 19, 2019. As part of this permit renewal, the 112(j) requirements will remain in their permit due to the timing of the transition to Subpart DDDDD requirements.

Per current guidance, every Title V Permit Renewal that contains a 112(j) condition must be amended. The following condition that was added during the previous renewal remains, in addition to boiler MACT requirements that will be added under a separate condition:

The Permittee shall comply with this CAA §112(j) standard until May 19, 2019. The initial compliance date for the applicable CAA §112(d) standard for "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters" is May 20, 2019.

Excerpt from latest inspection report dated November 1, 2018: Three natural gas-fired boilers (ID Nos. BNG-1, BNG-2, and BNG-3)

**Observed.** Two (2) of the boilers (ID Nos. BNG-1 and BNG-2) are located on the finishing side of the plant while the other boiler (ID No. BNG-3) is located on the upholstery side. The facility also refers to the boiler (ID No. BNG-3) as the low pressure boiler. The natural gas fired boiler (ID No. BNG-1) has been disconnected and has not been operated in more than 6 years. The natural gas fired boiler (ID No. BNG-2 and BNG-3) were not in operation during the inspection. They are operated for comfort heat only in the winter. The boiler (BNG-2) was built in 1968. The natural gas-fired boiler (ID No. BNG-3) was built in 1983.

No changes to the permit stipulations are required.

 Condition 2.1.C.4: 15A NCAC 2D .1109: 112(J) CASE-BY-CASE MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (Clean Air Act Section 112(j) - Caseby-Case MACT for Boilers & Process Heaters).

The Permittee shall use best combustion practices when operating the affected boilers (ID Nos. BNG-1, BNG-2, and BNG-3). The initial compliance date for this work practice standard and the associated monitoring, recordkeeping, and reporting requirement is February 5, 2013. The facility must comply with 112(j) until May 19, 2019. The initial compliance date for the applicable 112(d) standard for NESHAP Subpart DDDDD is May 20, 2019. The Permittee shall perform an annual inspection and tune-up of each boiler for 112(j). The inspection should occur within a calendar year as per section 2.1.C.4.e of the air permit. As a minimum, the inspection shall include the following: 1) inspect the burner, 2) inspect the flame pattern and optimize, 3) inspect the system controlling the air-to-fuel ration. The results of the inspections and maintenance shall be maintained in a logbook. Reporting is not required.

**Observed.** The tune-up for BNG-2 was completed on November 17, 2017. The next tune-up is scheduled for later this month. The tune-up for BNG-3 was completed on November 20, 2017. The next inspection is due in calendar year 2018. BNG-3 has limited capacity to modify the operating parameters; the boiler is inspected for proper operation. Boiler BNG-1 has not operated since the last inspection. Appropriate records are being maintained. Compliance is indicated.

No changes to the permit stipulations are required.

15A NCAC 02D .1111 "Maximum Achievable Control Technology" (40 CFR 63, Subpart DDDDD) As required under 02Q .0526 "the Director shall establish a compliance date in the revised permit that assures that the owner or operator shall comply with the promulgated standard within a reasonable time, but no longer than eight years after such standard is promulgated or eight years after the date by which the owner or operator was first required to comply with the emission limitation established by permit, whichever is earlier. However, in no event shall the period for compliance for existing sources be shorter than that provided for existing sources in the promulgated standard."

Per 40 CFR 63.56(b), the "switch over" date:

- o Must be within a reasonable period of time; and,
- Cannot exceed 8 years from the promulgation date.

### Part 63, Subpart B, Table 1 40 CFR Ch. I (7–1–11 Edition)

•••

(b) If the Administrator promulgates a relevant emission standard under section 112(d) or (h) of the Act that is applicable to a source after the date a permit is issued pursuant to §63.52 or §63.54, the permitting authority must incorporate requirements of that standard in the title V permit upon its next renewal. The permitting authority must establish a compliance date in the revised permit that assures that the owner or operator must comply with the promulgated standard within a reasonable time, but not longer than 8 years after such standard is promulgated or 8 years after the date by which the owner or operator was first required to comply with the emission limitation established by the permit, whichever is earlier. However, in no event shall the period for compliance for existing sources be shorter than that provided for existing sources in the promulgated standard.

"Under the Clean Air Act, existing major source boilers with [CAA §112(j) standards] in their permits would have until at least 2018 to comply with the federal air toxics standards, <u>unless the</u> State sets an earlier deadline."

▶ See Lisa Jackson (US EPA Administrator) letter to Sen. Kay Hagan, dated March 8, 2012.

Thus, the facility must comply with the Case-by-Case MACT from initial 112(j) compliance date until May 19, 2019. At that point, Century Furniture must comply with the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63 Subpart DDDDD or MACT 5D).

Boiler MACT (40 CFR 63 Subpart DDDDD) language will be added to the renewed permit per current DAQ Title V guidance. Language provided by the 112(j) to MACT 5D Transition Team will NOT be removed; the 112(j) requirements will remain in addition to the boiler MACT requirements as provided by Mr. Joe Voelker, DAQ Permitting Section based on current emission source information provided by Century Furniture. On February 18, 2019, Mr. Voelker provided three separate boiler MACT conditions for the three natural gas-fired boilers located at Century. Due to the heat input capacities, they fall into three different categories. In an effort to shorten the permit and eliminate redundancy, this review engineer combined the three conditions into one with three separate work practice standards:

- equal to or greater than 10 million Btu per hour (**ID No. BNG-1**);
- greater than 5 million Btu per hour and less than 10 million Btu per hour (**ID No. BNG-2**);
- less than or equal to 5 million Btu per hour (**ID No. BNG-3**)

See Section VII for more detailed discussions of MACT requirements.

### 15A NCAC 02D .1111 "Maximum Achievable Control Technology"

[40 CFR Part 63 Subpart JJ]

This condition was updated based on the current shell guidance and typos found during this review.

See Section VII for a discussion of MACT requirements.

### VII. NSPS, MACT/GACT, PSD/NSR, 112(r), CAM:

### **NSPS**

There are no New Source Performance Standards (NSPS)-affected sources at the facility.

### MACT/GACT

### 1. Case-by-Case MACT

As discussed above, three natural gas-fired boilers (ID Nos. BNG-1, BNG-2 and BNG-3) are subject to 2D .1109 "112(j) Case-by-Case Maximum Achievable Control Technology"

Based on the most recent inspection, Century appeared to be complying with the regulation. Continued compliance will be determined during subsequent inspections.

The permit stipulation has been updated to include the MACT Subpart DDDDD crossover date and a paragraph covering startup, shutdown, and malfunction events was removed.

### 2. MACT Subpart JJ

The furniture finishing operations are subject to MACT Subpart JJ. In order to demonstrate compliance, Century must only use materials that meet the requirements of 63.802(a)(2) and (3) and 63.804(a)(4).

Century must comply with the MACT monitoring, recordkeeping, and reporting requirements. Based on the most recent inspection report and the information in IBEAM, Century has been complying with these requirements.

Continued compliance will be determined during subsequent inspections.

The permit was previously updated to include the formaldehyde requirements found in 63.802(a)(4).

#### PSD/NSR

The facility is not considered Prevention of Significant Deterioration (PSD) Major.

The Catawba County PSD Minor Source Baseline was triggered for PM<sub>10</sub> as of 07/21/78 by Century Furniture.

### 112(r)

The facility does not store materials subject to Section 112(r) of the Clean Air Act above the thresholds listed in that regulation.

#### CAM

15A NCAC 02D .0614 [40 CFR Part 64] COMPLIANCE ASSURANCE MONITORING (CAM) Based on previous CAM applicability determinations, none of the control devices at the facility meet the criteria for CAM applicability. Therefore, CAM does not apply.

### VIII. Toxic Air Pollutants

Century's primary operations are wood furniture manufacturing and combustion sources, which are exempt per 15A NCAC 02Q .0702 EXEMPTIONS (a)(23) and (27) as toxics emission sources because they are subject to MACT Subpart JJ, Subpart DDDDD and Subpart 112(j). The facility does not currently have any TAP emission limits in the permit.

### IX. Facility Emissions Review

Several years of emission data are included in the table on the first page of this review. The changes made during this permit renewal are not expected to change the facility's potential or actual emissions.

### X. Compliance Status

a. Notices of Violation/Recommendation for Enforcement since the previous renewal:

None noted.

b. Inspection status based on most recent inspection report dated November 1, 2018:

The Regional Inspection stated that "based on my observations during this inspection, this facility appeared to be in compliance with the applicable air quality regulations."

c. Other compliance requirements and issues:

The facility has one parts washer that is not specifically described in the permit. The lid on the one that was observed was closed during the inspection. The facility does not routinely use this source. The facility is considering removing the source and replacing it with a "green" solvent parts washer.

It was found during the previous inspection that the facility has joint use/ownership of an electric powered fire pump with is located on the adjacent property, Blue Ridge Products, Inc. 3050 Main Ave, NW (Facility ID No. 1800374). The sign on the outside of the building says HSM Solutions. The pump is located in a space on the front right of the building behind a red door. Since the fire pump is electric driven, it is not subject to NESHAP 4Z or NSPS 4I or 4J.

RCO: To date no request to add a parts washer was received. An email was sent to Mr. Dennis Tart on February 12, 2019 asking if there were any changes that needed to be addressed since submittal of the renewal applications. Mr. Tart indicated that there were none (Refer to Section IV).

### XI. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. The States of South Carolina and Mecklenburg County Local Programs are affected state/local programs within 50 miles of the facility.

The following comments were received: XXXX

### XII. Conclusions, Comments, and Recommendations

#### Professional Engineering Seal

A Professional Engineering Seal (PE Seal) was NOT required for this permit renewal.

### **Zoning Consistency Determination**

A consistency determination was NOT required for this permit renewal.

MRO was presented a copy of this Draft permit for review and has recommended that the permit be issued.

RCO concurs with MRO's recommendation to issue this renewal permit.